

**COMMUNITY SERVICES BLOCK GRANT
POLICIES
SFY 2014**

**Department of Health and Human Services
Grants Management Unit
State of Nevada**

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*The documents related to these policies are located on the DHHS website at www.dhhs.nv.gov.
Click on the Grants Management Unit, then click on the Community Services Block Grant tab.

Community Services Block Grant Policies

P-1 Establishment of CSBG Policies

These policies are established to organize information important to the management of the CSBG program into one document. CSBG recipients will be able to access these policies on the DHHS website and will also have web access to the supporting documents referenced in these policies.

CSBG recipients will have an opportunity to review and comment on new policies as well as changes to existing policies before they are finalized.

The acronyms used throughout this document are as follows:

CAAs = Community Action Agencies
CSBG = Community Services Block Grant
DHHS = Department of Health and Human Services
GMAC = Grants Management Advisory Committee
GMU = Grants Management Unit
OCS = Office of Community Services
ROMA = Results Oriented Management and Accountability

P-2 Tripartite Board Standards

Tripartite Board Standards have been adopted to insure that Nevada CAAs achieve compliance with federal CSBG regulations and guidelines. The Standards, along with federal Information Memorandum #82, provide the structure and guidance for CAAs to follow in establishing and operating their board. The Standards are available on the DHHS website at www.dhhs.nv.gov.

P-3 Grant Application Requirements

CSBG recipient agencies are required to submit a renewal application every year consisting of a budget, program description, and goals. In addition, an updated community needs assessment is required every three years.

CAAs will have an opportunity to review and comment on the application components whenever changes are made by DHHS.

P-4 Administrative Costs

Administrative costs will be reviewed and approved on a case by case basis as part of the renewal application and budget modification process. All administrative costs charged to CSBG must be necessary to accomplish the goals of CSBG. Although the CSBG Act does not establish a maximum percent of agency administration that can be charged to CSBG, DHHS has established a goal of limiting administrative expenses to no more than 20% of the total award. DHHS will review the need to exceed this goal on a case by case basis and will work with CAAs that are above the 20% goal on strategies for reducing administrative costs.

P-5 Income Eligibility for Families and Individuals

Individuals and families receiving CSBG supported services must be below 125% of the federal poverty level. CSBG recipient and subrecipient agencies are required to conduct eligibility screening as part of their client intake process. CAAs must adopt procedures for each program that they administer to ensure that CSBG funds are only used to support individuals and families that meet the income eligibility requirement. CAAs may determine the types of documentation required to document income eligibility. If household income is 125% of poverty or below upon intake into the program, the individual (or family) is eligible to continue receiving services until the agency conducts a formal reassessment. CAAs are expected to establish reassessment policies and timelines to ensure that client income eligibility for CSBG services is handled in a uniform manner.

CSBG eligibility must be based on household income. A household is defined as all individuals living within the same household who are related to one another by birth or marriage. The income of all individuals in the household must be counted in order to assess eligibility for CSBG services.

Client eligibility screening is not practical for some services, for example parent education. In such cases, the agency must target service to individuals and families who are likely to be below the 125% poverty level.

CSBG funds are often combined with other funding sources that may have different income eligibility criteria. In these cases, the GMU will consider the proportionate amount of CSBG funding that used to provide the service in order to assess compliance with CSBG income eligibility standards.

P-6 Benefit Assistance Screening

CAAs are expected to screen and refer participants to the following income supports: 1) Earned Income Tax Credit; 2) Food Assistance: Food Stamps, WIC and community food programs; 3) Free or reduced cost health services: e.g., Nevada Check-Up, Community Health Clinics, Access Health, Great Basin Primary Care, Medicaid; 4) Childcare Assistance: CCDBG program; and 5) Energy Assistance: EAP; 6) Child Support Assistance.

Follow-up is required for all clients receiving family development, employment assistance and Head Start services to verify the results of the referrals. For these services, both the referral and follow-up must be documented.

P-7 Program Monitoring

CSBG recipient agencies will receive a program monitoring at least once every three years as required in the federal CSBG Act. New agencies will be monitored within six months after the first year of operation. The GMU may monitor agencies more frequently if they are large, have special issues or problems, or have experienced turnover in the executive director or chief fiscal officer position.

The monitoring process is designed to verify compliance with federal CSBG requirements, state CSBG policies, the application submitted by the agency, and GMU policies. Agencies will be required to submit a corrective action plan to address any identified deficiencies and follow-up will be conducted by the GMU.

P-8 Program Reporting

A) Semi-annual Reporting: CSBG recipient agencies will be required to submit a semi-annual ROMA report based on the standards adopted by the federal Office of Community Services. The GMU has developed a reporting system that complies with the federal ROMA requirements. Agencies will receive customized reporting forms and instructions at the beginning of each year from the GMU.

The semi-annual report will be due as follows:

Semi-annual Report	January 31
Final Annual Report	July 31

B) Annual Report: CAAs will be required to submit an annual report that includes: a client demographic summary form, fiscal reporting, and narrative elements based on federal reporting requirements.

C) GMAC Report: CAAs will be required to submit a quarterly GMAC report based on the three indicators that have been established for their agency and also provide a report on community projects. The report will be due approximately three weeks prior to the scheduled GMAC

meeting. The established schedule for GMAC meetings is the second Thursday of March, June, September, and December.

D) Additional Reporting: Additional reports may be requested if required by federal OCS, the legislature, the Governor's Office, or DHHS.

P-9 Subrecipient Guidelines

Subrecipient Guidelines have been established to ensure that basic CSBG requirements are followed when funds are subawarded by a CAA to another local organization.

CAAs may modify the procedures and sample formats provided in the guidelines to meet the needs of their organization. However, the basic components of the subrecipient process must be utilized to administer all subawards.

P-10 Corrective Action and Termination of Funding

Different levels of corrective action have been established based on the level of severity of agency non-compliance with CSBG requirements and/or poor fiscal, board, or management performance.

Corrective action plans: CAAs will be asked to submit corrective action plans to address non-compliance issues identified by the GMU during the administrative oversight of the grant or through program monitoring. The agency will be provided with an opportunity to develop a corrective action plan and timeline to address identified deficiencies.

Grant Conditions: Grant conditions may be established at any time to address more serious non-compliance or performance issues.

High Risk Status and Quality Improvement Plans: CAAs experiencing serious performance issues that potentially jeopardize the ability of the agency to effectively administer CSBG funds and provide services in the community will be requested to submit a Quality Improvement Plan. The GMU will follow the corrective action process outlined in *Section 678C Corrective Action; Termination and Reduction of Funding* of the CSBG Act and the guidelines provided in OCS Information Memorandum #116 to address major deficiencies identified in the performance of CAAs. As required by the federal OCS, the GMU will notify OCS to place the agency of the national list of high risk CAAs. The CAA will be required to submit a Quality Improvement Plan and demonstrate satisfactory progress to avoid termination of funding. DHHS will request OCS to remove the agency from the high risk list once the Quality Improvement Plan has been completed.

P-11 Funding Formula

A CSBG funding formula has been established to allocate at least 90% of federal CSBG award to eligible CAAs as required by the federal OCS grant. The formula includes a base allocation for each eligible entity, a distribution of funds based on the percent of the state's poverty population residing in each service area using the most recent U.S. Census estimates, and a distribution of funds based on the unemployment rate in each county service area.

The poverty population factor in the formula will be updated as new federal census poverty data or estimates become available. The unemployment rate for each county service area will be updated each year immediately prior to the release of the formula.

A public hearing, as required in the CSBG Act, will be held prior to enacting any changes to the formula beyond the annual updates referenced above.

P-12 Plan for Spending Discretionary CSBG Funds

The GMU will prepare a discretionary CSBG spending plan prior to the beginning of each grant year and provide an opportunity for CAAs to review and comment on the plan.

P-13 Designation of Eligible Entities

If a designated Community Action Agency (CAA) voluntarily relinquishes its designation as a CAA or is terminated, DHHS will determine which organizations operating in the service area have the capacity to serve as a CAA. The DHHS Director may designate a CAA from among the viable organizations, may opt to issue a Request for Applications, or may designate a CAA from outside the service area to serve as the temporary or permanent CAA. If a CAA is designated as a temporary CAA in an unserved area, the terms will be specified in the grant award.

Priority will be given to non-profit agencies throughout the selection process. If a viable non-profit is not available, a local governmental entity will be considered. This policy will follow the requirements described in Section 676A of the CSBG Act, *Designation and Redesignation of Eligible Entities in Unserved Areas*.

P-14 Restrictions on Use of Funds for Construction

Agencies are prohibited from using CSBG funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement of any building or other facility. This prohibition is described in *Section 678C Limitations on Use of Funds* in the CSBG Act.

The CSBG Act includes a provision for DHHS to request a waiver from OCS. A waiver will only be sought when no other viable options exist and services to low-income families and individuals may be jeopardized.

P-15 Customer Privacy

CAAs must establish internal policies to protect the privacy of customers. Paper records must be secured and access to records limited to appropriate staff. Electronic records must also be protected with access limited to appropriate staff.

CAAs providing health care services must maintain client privacy and records in compliance with the Health Insurance Portability Accountability Act (HIPAA), Public Law 104-191.

P-16 Annual CSBG Calendar

The following outlines the annual deadlines for reports and grant amendments. The deadlines may be modified as needed in order to meet administrative requirements or to address the needs of the CSBG recipient agencies or the Grants Management Unit.

Activity	How Often?	Due Date
Request for Funds	Monthly or Bi-monthly	Prior to the end of the following month. Example: requests for the month of July are due August 31
ROMA Reporting	Semi-annual	Semi-annual report due by January 31 Final report due by July 31
GMAC Reporting	Quarterly	Agency will be notified of due date
Annual CSBG Report	Annually	September or October, agencies will be notified of due date
Budget Amendment based on actual Carryover	Annually	August or September, agencies will be notified of due date
Application/Renewal Application	Annually	April or May, agencies will be notified of due date

P-17 Child Support Services and Referrals

Per section 678G(b) of the CSBG Act, CAAs are required to inform custodial parents in single-parent families that participate in programs, activities, or services carried out or provided under this subtitle about the availability of child support services and refer eligible parents to the child support offices of State and local governments.

P-18 Voter Registration Prohibition

CAAs are prohibited from participating in voter registration activities. Refer to OCS memorandum #81 for the specific language that addresses this prohibition.